



Heritage Services Sustainability Action Plan

Bath & North East
Somerset Council

Improving People's Lives

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A Message from our Managing Director

Bath & North East Somerset Council (B&NES) was one of the first councils to declare a climate emergency in 2019, followed by an ecological emergency in 2020. The Council are committed to building a sustainable future for Bath and North East Somerset that is net zero and nature positive.

The Council's current priorities in tackling the climate emergency are to: decarbonise buildings, decarbonise transport, increase renewable energy generation, and cut council operational emissions to net zero¹.

Heritage Services is an essential part of B&NES; responsible for stewarding the public facing heritage assets in the council's care. The Council established Heritage Services as an independent business unit in 2005 allowing the service greater financial freedom and agility delivering, in return, an agreed surplus for the council. In 2024/25 this was £11.6M. Heritage Services is unique amongst UK local authorities in operating at no cost to the local taxpayer; the service is singular, within the council, in self-funding all cost increases. The profit from commercial operations contributes directly to the surplus Heritage Services returns to the council to support core services.

This action plan sets out how Heritage Services plan to cut our greenhouse gas emissions in the next 3 years, whilst establishing a pathway to reach net zero greenhouse gas emissions.

Preserving the monuments, buildings and collections in our care is essential for creating memorable, relevant and emotionally charged experiences for all. These assets embody the history and identity of local communities. As the effects of climate change are becoming increasingly prevalent on a local and global scale, we must take bold strategic action to minimise our impacts on the climate so that future generations can continue to engage with and enjoy the monuments, buildings and collections we care for. Engaging with people on this topic can positively impact their well-being, much like the social connection sought by people coming to The Roman Baths for over two millennia.

This 3-year Sustainability Action Plan, from FY25/26 – FY27/28 inclusive, sets out how Heritage Services will tackle the climate emergency, become more resilient to the effects of climate change, and contribute to the climate & ecological priorities set out by B&NES. The cornerstones guiding our sustainability goals & focus are:

PLACE • PEOPLE • HERITAGE

Anchoring all goals & targets to these 3 interconnected pillars ensures that we respect and preserve Bath & North East Somerset's culture and history whilst meeting the needs of current and future stakeholders.



Robert Campbell,
Managing Director, Culture and Heritage Services

Our Heritage Services sustainability objectives are as follows:

DECARBONISE OUR OPERATIONS • IMPROVE SUSTAINABILITY DATA ACCURACY • EMPOWER AND ENGAGE OUR VISITORS, EMPLOYEES AND SUPPLIERS • LEAD BY EXAMPLE

1. 2024 B&NES Climate Emergency Progress Report. The Council priorities may change as their strategy develops in the coming years.

FASHION MUSEUM BATH
VISITOR NUMBERS APPROX. 100,000
PRE-CLOSURE*

BATH RECORD OFFICE
Visitor numbers 1,500*

THE PUMP ROOMS
Diners numbers 69,400*

VICTORIA ART GALLERY
Visitor numbers 51,000*

WORLD HERITAGE CENTRE
Visitor numbers 100,000*

THE ROMAN BATHS
Visitor numbers 1,008,000*

Heritage Services Portfolio

Heritage Services is responsible for the following:

THE ROMAN BATHS

The Roman Baths is an award-winning museum and ancient monument with a designated on-site collection, located in the heart of the UNESCO World Heritage City of Bath. It has the hottest geothermal spring in the UK, some of the finest Roman remains in Northern Europe and has a continuous flow of millions of people bringing their experiences and cultures to shape its story through the ages.

THE PUMP ROOMS

The Pump Rooms were first built in 1706. To cope with increasing demands, a new Pump Room was begun in 1789 and finished in 1799. It was built in the classical style and was a meeting place for the Georgian elite where people were able to take refreshment and also drink the mineral-rich spa water. This is the primary food and beverage venue operated by the Service. We partner with Searcys to provide the offer here.

FASHION MUSEUM BATH

Fashion Museum Bath is currently undergoing a transformation to create a groundbreaking museum that will bring fashion to life for local and global audiences, reshaping Bath for the future. Although currently closed, its object loans to other institutions were seen by over 1.3m people globally in 2024.

BATH'S HISTORIC VENUES

Alongside these buildings Heritage Services also operates the Bath Historic Venues brand. This team oversee the commercial venue hire offer across the above sites, the Guildhall and B&NES' parks.

VICTORIA ART GALLERY

Victoria Art Gallery was named to celebrate Queen Victoria's 60 years on the throne; the public gallery includes over 1,500 decorative arts treasures from the 17th century to the present day with works by Thomas Gainsborough, Thomas Jones Barker and Walter Sickert.

THE BATH RECORD OFFICE

The Bath Record Office Archives and Local Studies collects, preserves, promotes and provides access to archives and local studies collections relating to Bath & North East Somerset and its communities.

WORLD HERITAGE CENTRE

World Heritage Centre hosts interactive exhibits and displays designed to inspire, excite and inform visitors about the city's attributes of outstanding universal value. The City of Bath is exceptional in having two UNESCO inscriptions. In 1987 it was inscribed for its Hot Springs, Roman archaeology, Georgian buildings and natural landscape setting. In 2021 a second inscription was received as one of the Great Spa Towns of Europe – fashionable spa towns laid out around natural springs which are used for health and wellbeing.

CLORE LEARNING CENTRE

Clore Learning Centre was a former Victorian spa laundry building, sitting beneath street level in between The Roman Baths and The World Heritage Centre. With support from the National Lottery Heritage Fund, in 2022 it was sensitively renovated to allow schools and community groups to learn about history and heritage in a hands-on and accessible way.

Current Impact

Our annual carbon footprint covers all visitor attraction sites, the Pump Room restaurant, offices and leased storage facilities under the care of Heritage Services. Calculating the emission intensity per visitor and employee allows us to see the carbon costs associated with the economic benefit brought to the area, which will in time help to shape our approach to carbon off-setting any residual emissions.



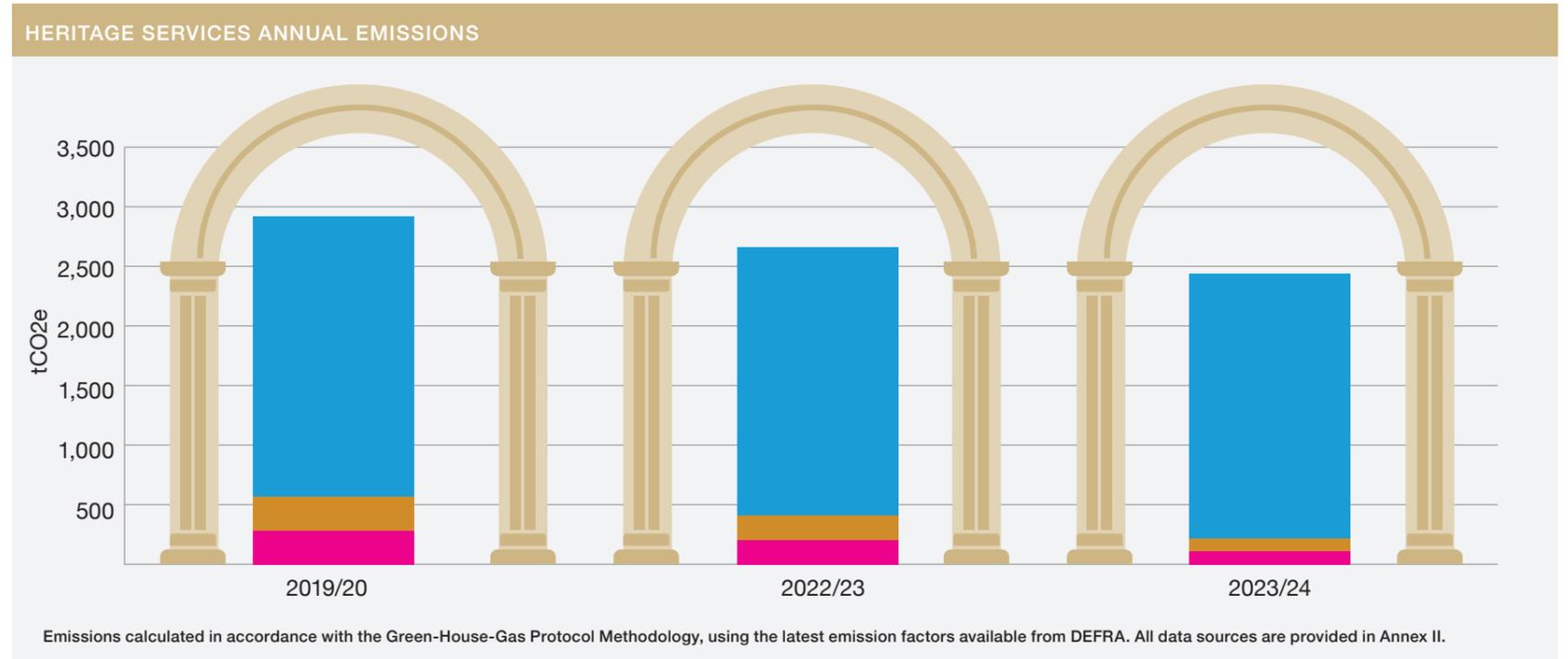
Current Impact

Our Carbon Footprint

The year which we are tracking targets against, our baseline year, is 2019/20.

As with many in the sector, the COVID-19 years between 2020-2022 were not truly representative of our business operations, and therefore omitted from analysis. Since our baseline year, we have made progress in reducing our total carbon footprint.

This is primarily due to the installation of heat exchange pumps in 2022 at the Roman Baths, and national grid decarbonisation. Currently, as with many organisations and with the complexities of Scope 3, 90% of our Scope 3 emissions are calculated using spend data, which is not conducive to effective decision making and subject to a high margin of error. We have plans to improve the quality and accuracy of our scope 3 data over time and how we do this is set out further down in this action-plan.



EMISSION SCOPE (tCO2e)	2019/20	2022/23	2023/24
Scope 1	293.7	242.0	77.5
Scope 2	345.3	201.5	221.7
Scope 3	2,416.3	2,421.3	2,217
Total (tCO2e)	3,055.4	2,864.8	2,516.1
Intensity: kgCO2e / Visitor	2.6	3.4	2.5
Intensity: tCO2e / FTE	19.7	19.0	17.1

Scope 1:

Direct emissions from owned and controlled sources of on-site gas and fugitive emissions.

Scope 2:

Indirect emissions from the purchase of grid energy.

Scope 3:

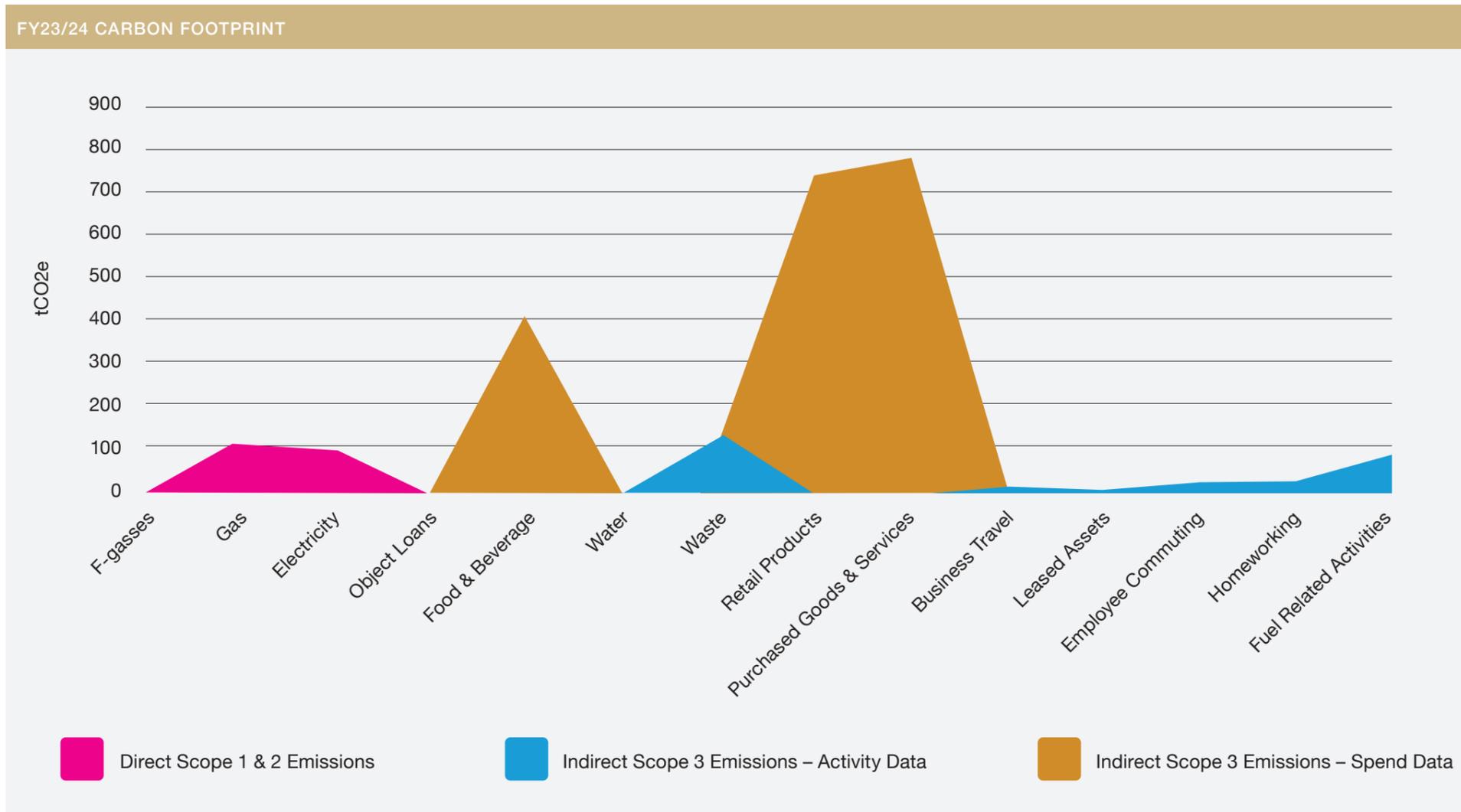
Indirect emissions from organisational activities outside of our direct control, but within our sphere of influence.

Current Impact

Annual Emissions Tracking

Our sources of greenhouse gas (GHG) emissions

Graph showing our sources of GHG emissions for latest reporting year of 23/24. We recognise that there are key sources of GHG emissions missing, such as digital and capital projects. We have specific targets set out below related to improving our data accuracy and broadening the scope of our understanding on some of these additional sources.



EMISSION SOURCE	tCO2e
Fugitive Emissions	0.5
Gas	77.0
Electricity	221.7
Object Travel	1.7
F&B (£)	405.0
Water	3.1
Waste	134.7
Retail (£)	739.4
PG&S (£)	727.4
Business Travel	15.6
Upstream Leased Assets	49.3
Employee Commuting	23.0
Homeworking	24.1
WTT T&D	93.6
FY23/24 total tCO2e	2,516

Table showing figures for the latest carbon footprint report, FY23/24. £ denotes categories calculated using spend-based proxy.

Current Impact

Annual Emissions Tracking

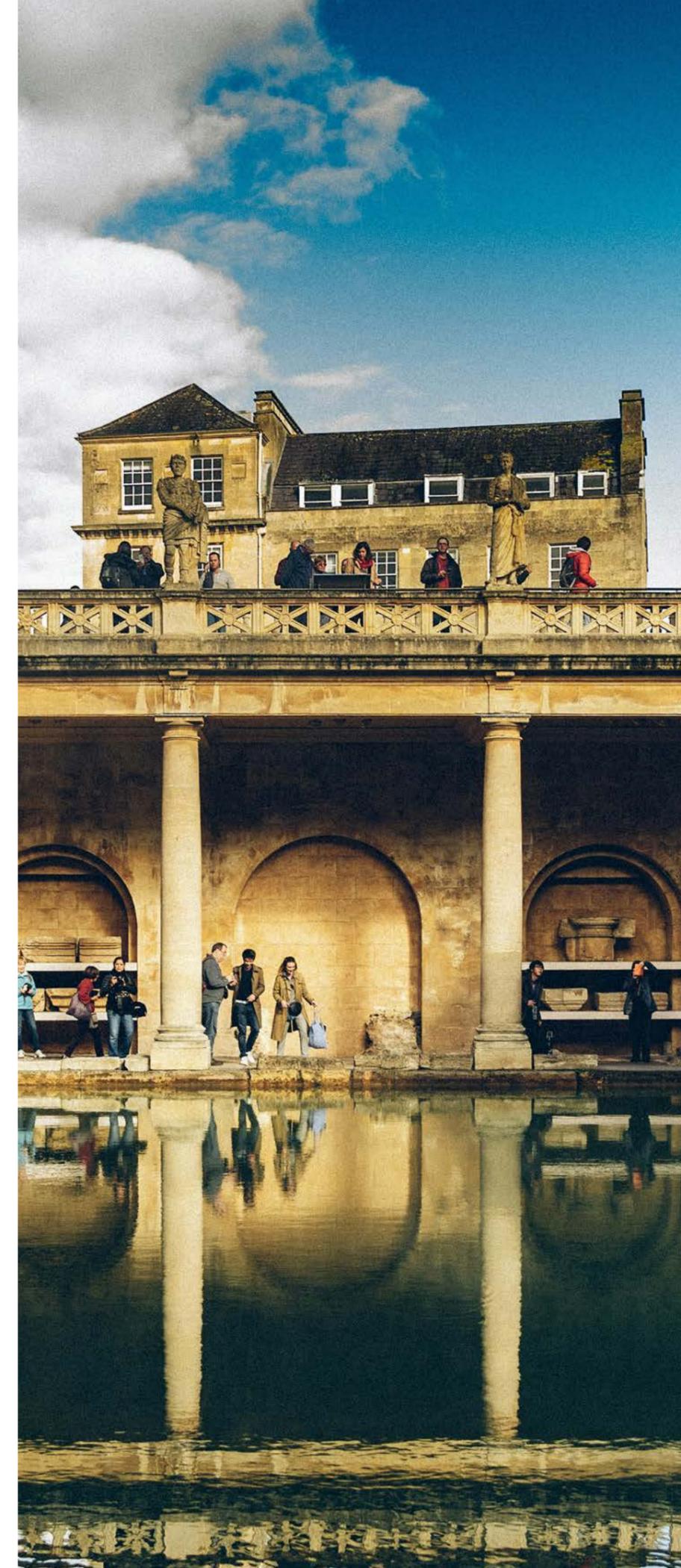
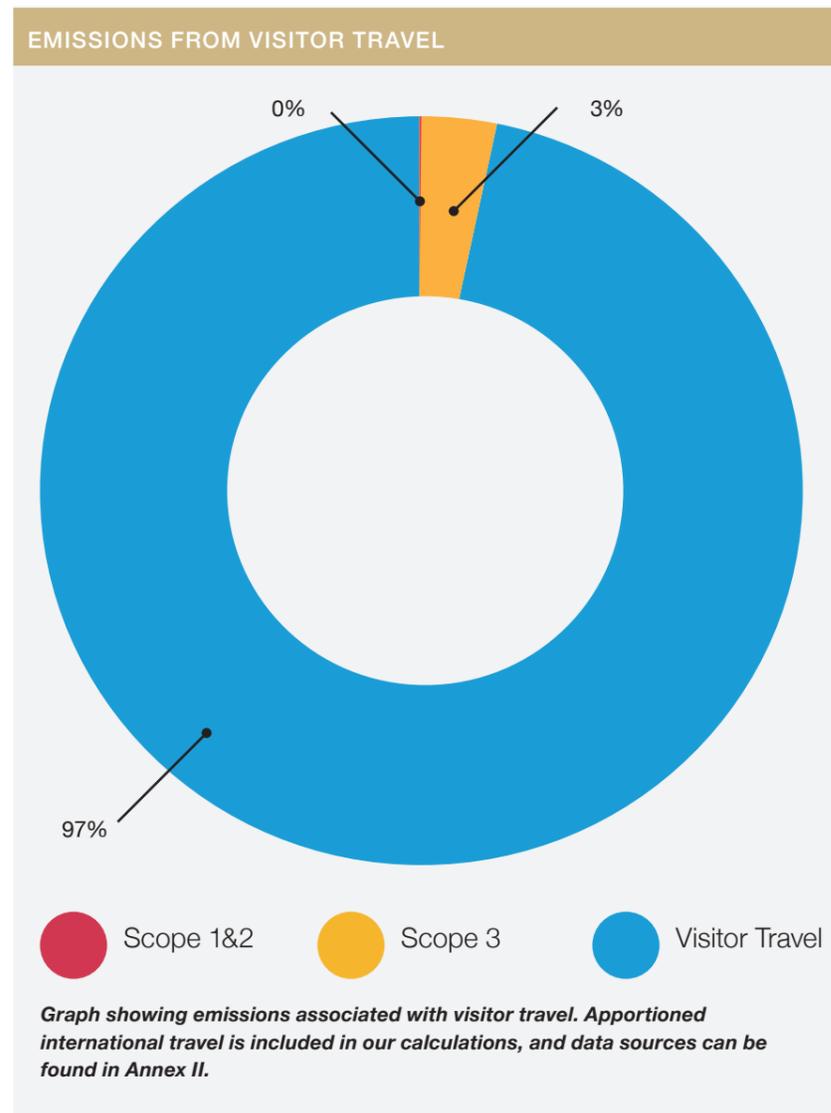
Visitor Travel Emissions

The emissions associated with visitor travel are not formally included in our carbon boundary – yet.

The very small data sample from our post-visit survey and the number of variables and uncertainty make for insubstantial analysis and reporting. We are, therefore, not confident in using this to inform any decision making. To address this issue, we are reviewing the data we have available to us from our own systems, and working with industry peers to formulate a common methodology for apportioning emissions based on mode of transport, dwell time, local and regional statistics.

In time, as we improve our data on visitor travel, we will be able to quantify visitor carbon emission costs against economic impact. In the meantime, we will work to enable and influence our visitors to make low emission choices and bring our total carbon footprint down.

	2019/20	2022/23	2023/24
Visitor Travel (tCO2e)	44,559.6	71,331.4	97,915.0



Our goals are centred around 3 key pillars:

People • Place • Heritage

We have set out interim goals that will enable us to close the gap between ambition and action as we progress towards net zero.

Underpinning the overarching goals laid out below are the United Nations Sustainable Development Goals (SDGs). Created under the 2030 Agenda for Sustainable Development in 2015, these goals act as a universal blueprint for all organisations, destinations and countries to achieve peace and prosperity for people and the planet.



FY27/28 Sustainability Goals

Place

The goals and targets under the Place pillar set out where we will be by March 2028 and will ensure that our wider influence is underpinned by sustainable building infrastructure and impact monitoring mechanisms.



FY27/28 Sustainability Goals

Goal: Decarbonise our Operations

Reducing our operational emissions is a key enabling action. By this we mean taking actions that create conditions for more sustainable practices to be maintained and removing any barriers to implementation.

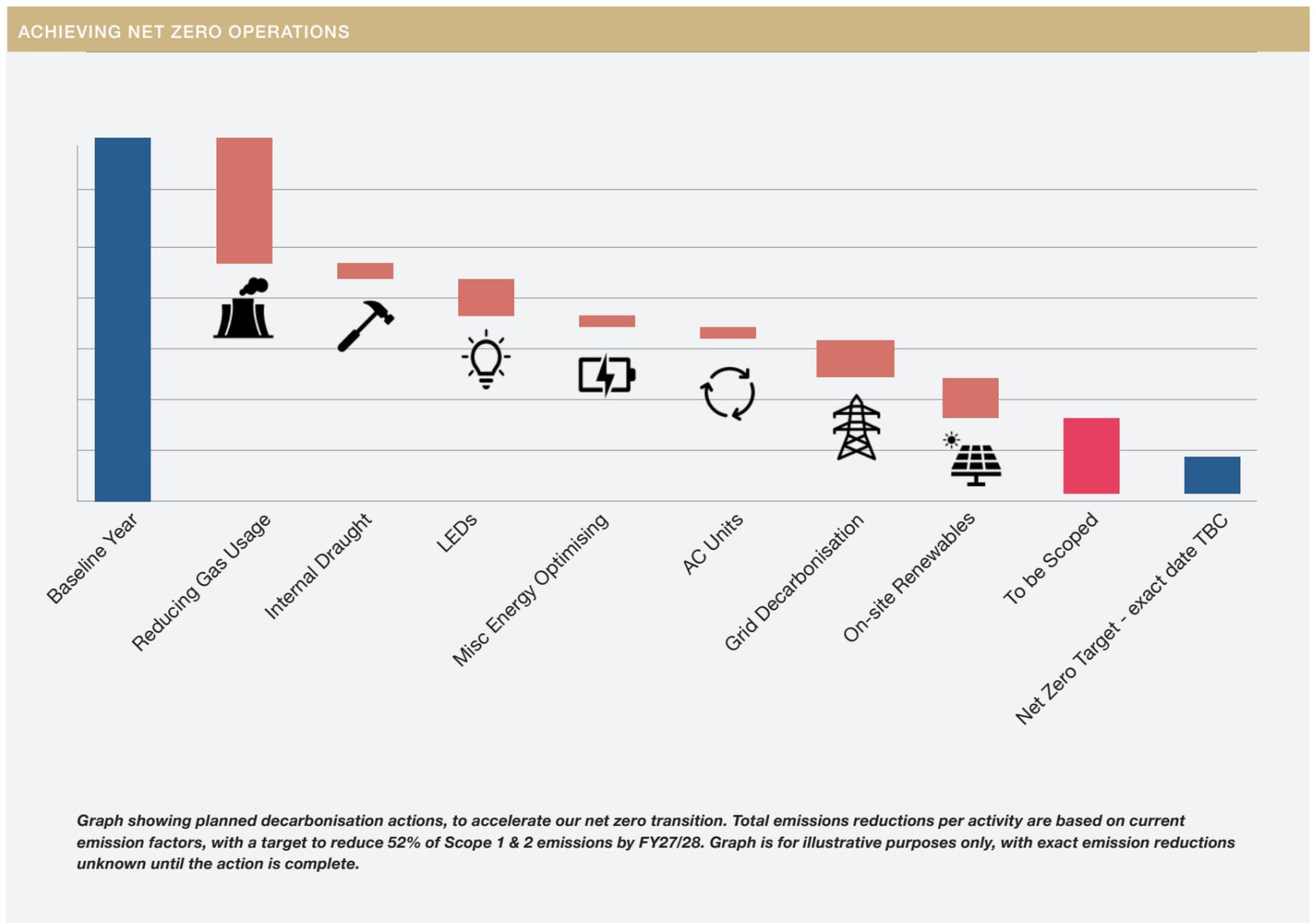
KPI'S:

- 52% reduction in Scope 1 & 2 emissions compared to baseline year
- Zero waste to landfill
- Increased proportion of recyclable waste

Between now and FY27/28, we will work with our key contractors to ensure efficient use of energy and resources, improve our recycling rate, optimise our existing systems and explore on-site renewable energy generation. Specific actions can be found in the table at the end of this document.



The term “Net Zero” focuses on **reducing** green-house-gas emissions as much as possible, with room to off-set any residual emissions. We have a clear plan to reduce our operational emissions by 52% over the next 3 years. We have wider external infrastructure challenges to overcome in order to be certain of the total sum of carbon emissions we will be able eliminate from our operations. By the end of this action plan covers, we will have our net zero target date set.



FY27/28 Sustainability Goals

Food and Beverage at the Pump Room

Heritage Services has a contract with Searcys to provide food and beverage services and event catering at the Roman Baths and Pump Rooms. Searcys have been proactively working to reduce their environmental impact at the Pump Room through their own Environmental Social Governance (ESG) Strategy, *Second Nature*. 2024 initiatives include³:

- Introducing two venue-based Sustainability Champions who have been ISEP (Institute of Environment and Sustainability Professionals) trained and attend quarterly sustainability best practice sharing sessions with the wider Searcys community
- Undertaking a sustainability assessment and proactively targeting improvements including reviewing our packaging solutions, measuring and reducing food waste and increasing our range of local suppliers
- Working collaboratively with suppliers to ensure ongoing improvements in animal welfare, environmental impact and ethical sourcing.

ENERGY REDUCTION:

Working in collaboration with Heritage Services, Searcys are targeting a move to 100% electric equipment when grid capability allows. Until that time, we are taking positive action through the implementation of:

- Energy and water efficiency checklist
- Energy saving posters
- ‘Step Up’ training which covers 5 modules including Sustainability & Energy at Work
- Steaming not boiling and using lids to reduce energy and water consumption
- Checking for leaking taps and monitoring behaviours
- Switching off computers, printers, phone chargers overnight or not in use.

FOOD WASTE IN FOCUS:

Searcys proactively measure food waste to assist in targeting reductions through behavioural change and positive actions. Food waste is separated into three categories – production, plate and spoilage waste. The cost of food waste is then measured against the cost of total purchases. Across 2024 food waste was 4.14% of total purchases. Searcys have an ultimate goal for food waste to be less than 3% of purchases.

Current actions Searcys have implemented include;

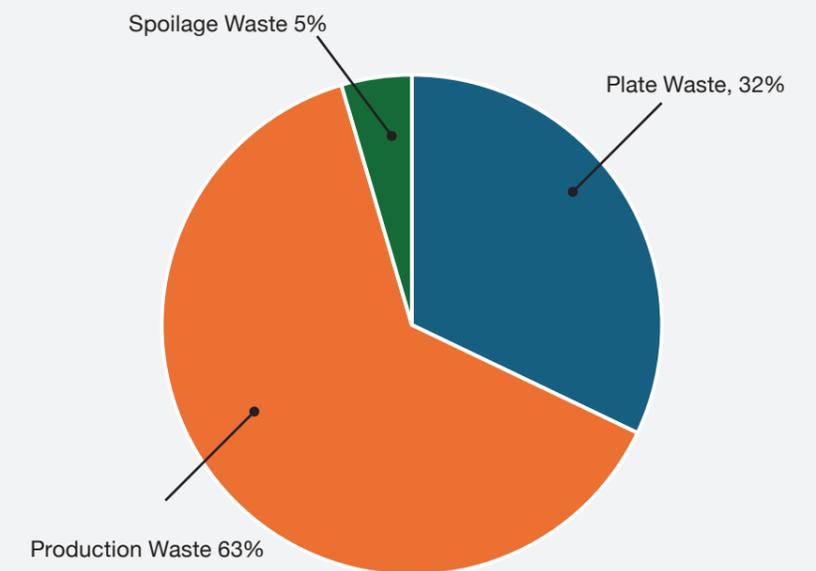
- Effective stock control measures to minimise spoilage
- Production sheets aligned to booking requirements
- An ongoing review of standing orders to ensure they reflect business needs week to week
- Maximising use of all ingredients i.e. not peeling vegetables unnecessarily
- Batch cooking. Pre-booking has allowed us to prepare more effectively for volumes anticipated.
- Looking for patterns and trends in plate waste to identify where portion size is over-generous.

RECENT DEVELOPMENTS INCLUDE:

- Incorporating coffee waste into food waste for recycling
- Introducing clear bags to visually aid our team to see the volume and type of waste being created
- Dedicated bins for separation in the servery and kitchen.

Searcys are actively seeking local partners for redistribution of edible food waste from the Pump Room Restaurant.

THE PUMP ROOM FOOD WASTE BY TYPE 2024



Graph showing Searcys food waste in 2024. More information can be found in Searcys ESG Strategy

FY27/28 Sustainability Goals

Goal: Improve our sustainability data accuracy

Accurate data monitoring is crucial for place-based decision making that helps contribute to future climate-change resilience.

KPI'S:

- Biennial update of employee commuting & homeworking data
- Supplier specific data covering 30% of retail spend
- Supplier specific data covering 30% of PG&S spend
- Begin digital carbon footprint measurement
- Improved visitor travel data accuracy

Data improvement is an on-going process, there will always be room for improvement and we don't want to wait for perfect data to start making changes to reduce our Scope 1 & 2 emissions. Our Scope 3 emissions are, like many, harder to quantify and rely on suppliers providing us with their emissions data.

For us this is a great opportunity to make a positive impact within our sphere of influence. We have committed and already started supporting our suppliers with getting to grips with their first carbon footprints, meaning they can make informed decisions to increase their resource efficiency, reduce carbon and indirectly reduce costs too.



FY27/28 Sustainability Goals

People

To achieve our environmental goals by March 2028, we must ensure stakeholders are well-informed about the effects of climate change. We have significant influence over the communities we serve – residents, visitors, employees, and suppliers.



FY27/28 Sustainability Goals

Goal: Empower and engage our visitors, employees and suppliers

By empowering people to make informed decisions, and having the right infrastructure in place, we can continue providing rich cultural experiences for decades to come and increase the social value⁵ that visitor spending brings to Bath and North East Somerset.

KPI'S:

- Retail suppliers covering 30% of spend to have net zero target in place
- Suppliers covering 30% of spend in Purchased Goods & Services category to have net zero target in place
- 100% of Full Time Employees to be certified carbon literate
- All teams to have environmental action plan objectives included in individual forward job plan objectives
- Reduction in emissions intensity per kg of Pump Room food & beverages
- 100% in sustainability question within mystery visitor reports

The actions to deliver this goal are based on communicating and engaging with our key stakeholders. We have already started to deliver this through supporting some of our suppliers with sustainability training and guidance on data. In order to deliver our decarbonisation actions and improve the way we communicate our environmental impact to visitors our employees must feel confident on the subject matter of climate change, so we will be offering all employees the opportunity to undertake carbon literacy training with a target for 100% of FTE (full-time equivalent) employees to be certified by FY2027/28.

We already communicate to our visitors through Audioguides and guided tours, but we plan to improve this by widening the scope, embedding more sustainability topics into communications, and building strategic partnerships that help to minimise environmental impacts.



⁵ B&NES Social Value Policy: Social Value refers to the outcomes that will provide benefit to the residents of the Council area, either directly and individually or through businesses and community organisations
⁶ Goal 8, Target 9: devise and implement policies to promote sustainable tourism that creates jobs and promotes local culture and products. Goal 12, Target 6: Encourage companies to adopt sustainable practices and to integrate sustainability information into their reporting cycle. Goal 13, Target 2: integrate climate change measures into policies, strategies and planning.



FY27/28 Sustainability Goals

Heritage

The heritage assets we preserve for future generations are recognised as having outstanding importance for people across the globe. Their historical significance has been confirmed at a national level and they contribute to the City's unique offering and double UNESCO inscription.



FY27/28 Sustainability Goals

Goal: Lead by Example

In the face of a climate emergency, everything we do as a service must protect this special place. By March 2028 we will draw from partnerships, industry standards, government guidance, and stakeholder feedback to develop our approach in adapting and being more resilient to future climate risks.

KPI'S:

- Obtain external accreditation & recognition for organisational sustainability
- Number of climate-related risks identified and adapted to
- Visitor, employee and industry-peer engagement metrics
 - Employee training, visitor questions, website sustainability section engagement, sustainability marketing campaigns, and sector partnerships
- Number of joint partnerships and projects undertaken

To lead by example we must take bold actions, and share our learnings. As such a unique site, with 1 million litres of water running through each day, we face challenges in adapting to climate related risks. We will share progress as we develop our approach and better understand how heritage assets and listed buildings can become more resilient to climate change. Facilitated sharing is beneficial when developing new solutions. We have already started to engage with external partners to unpick some of the key problems in our sector - sustainable tourism, climate risk adaptation, retrofitting historic buildings - and will continue to develop and share what we collectively think is best practise on some of these industry-wide concerns.



Adapting to Climate-related Risks

To anticipate, adapt and be more resilient to future climate-related risks, we need to map our risks. We will use our agency as a leading visitor attraction to share findings and help the heritage sector to prepare for the future.

The latest science is clear – our climate has already changed, and we are heading towards uncharted territory. In 2024, global warming exceeded the limit of 1.5°C above pre-industrial levels for the first time since records began⁸. We are already seeing an increase from climate-related pressures, a primary example being flooding from the River Avon backing up into the Great Drain and having an adverse impact on the Roman Baths complex. Other climate-related risks can manifest in a number of ways, whether storm damage or urban heat island effects, the predicted future climate projections pose a threat to heritage buildings and people's cultural experiences. We must learn from the past and prepare for the future. However, the impacts of potential natural hazards compounded with the uncertainty of future climate change scenarios makes it difficult to identify and measure risks accurately. By leveraging research, innovation and creativity we plan to map, mitigate and adapt to climate risks so that heritage assets can be passed through time and not damaged in transition.

MITIGATION:

Actions taken to reduce the impact of climate change on our planet. We are mitigating these impacts through reducing our greenhouse gas emissions.

ADAPTATION:

Actions taken to adjust to the physical effects of climate change. We are adapting to changing climates by putting in place measures to protect the Roman Baths against increased rainfall and flood risks.

RESILIENCE:

The ability and capacity to foresee and manage adverse climate-related risks. We are working on ensuring we can respond and be resilient in the face of unknown climate-related risks⁹.

The latest independent assessment of UK Climate Risks sets out 61 specific risks to local governments. We will be working closely with the Council, and external organisations, to better understand these risks and what actions we need to take to manage and adapt to them. Insights from the Met Office, and The West of England Mayoral Combined Authority state the climate hazards most relevant to us in B&NES are:¹⁰



Fluvial / Pluvial Flooding



Overheating



Drought



High winds (storms)

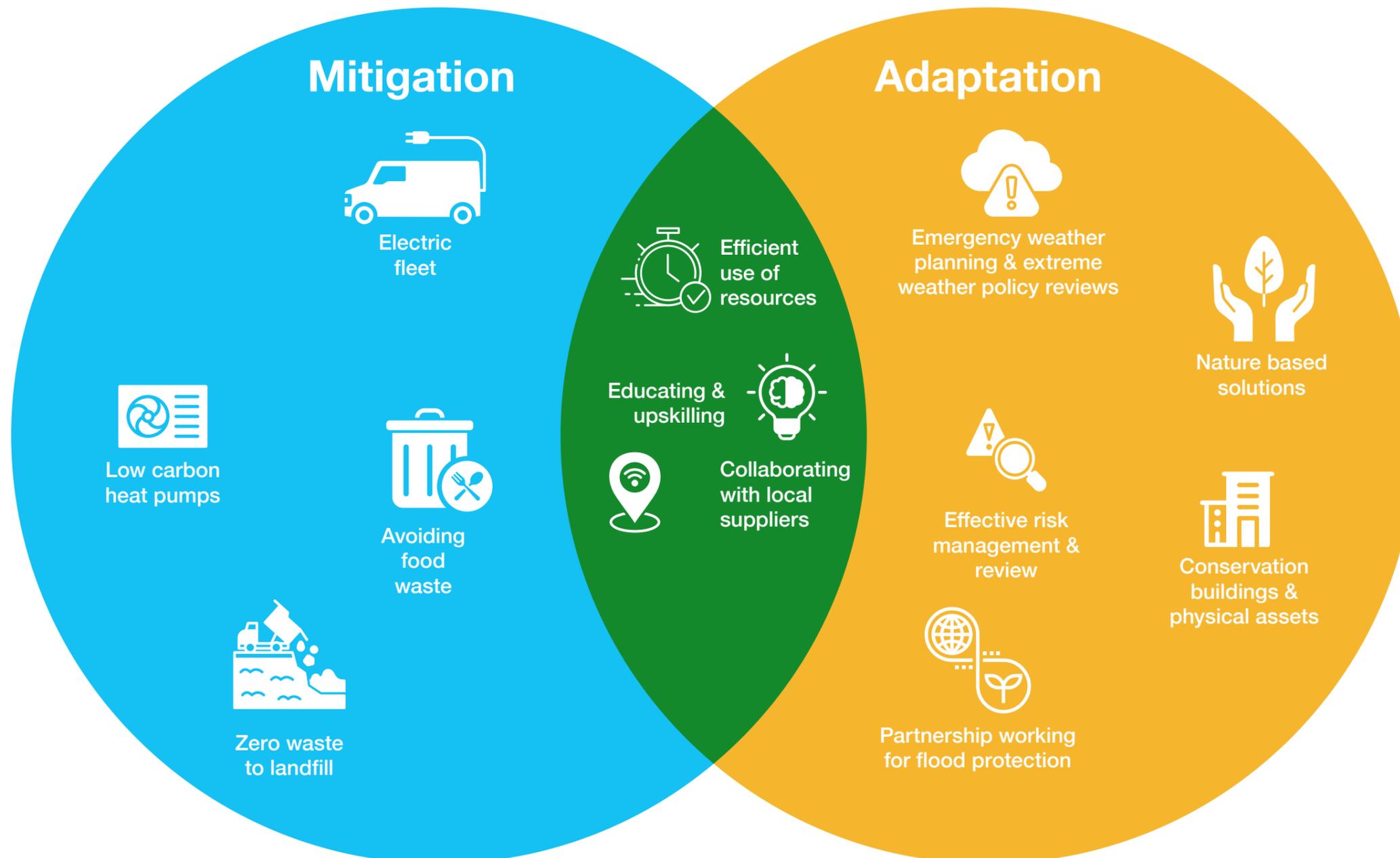
⁸ Based on 6 international data sets used by the World Meteorological Organisations. The 2015 United Nations Paris Agreement set a global goal to limit Global Temperatures to 1.5 °C in order to lessen the effects of climate change.

⁹ All definitions come from the IPCC <https://www.ipcc.ch/sr15/chapter/glossary/>

¹⁰ <https://www.westofengland-ca.gov.uk/wp-content/uploads/2023/07/WoE-MCA-Climate-Adaptation-Report-Apr25.pdf>

Adapting to Climate-related Risks

Work in this area is still underway, and whilst many of the risks we identified are picked up in our routine maintenance and conservation schedules, there are some gaps and areas for concern – most notably the Thermal Spring. In 2026, we plan to improve our understanding of the climate impacts on the thermal spring with improved monitoring and evaluation. Our risk register is reviewed and updated quarterly.



Adapting to Climate-related Risks

Climate Risk Summary

Roman Baths

As climate change continues to affect weather patterns and environmental conditions, the Roman Baths is taking proactive steps to understand and manage the risks it faces.

This summary outlines the key climate-related risks identified and the actions being taken to protect our heritage, visitors, staff, and collections for generations to come.

In FY26/27 we will repeat this process for all other Heritage Services sites.

1. Heavy Rainfall & Flooding

Risks:

Damage to historic buildings, monuments, and collections; health and safety concerns for visitors and staff; potential financial losses from closures

Actions underway:

- Roof drainage improvements
- Flood management plans
- Regular conservation and environmental monitoring
- Emergency procedures for visitor safety



2. Overheating

Risks:

Damage to collections from heat and UV exposure; discomfort for staff and visitors; potential drop in visitor numbers

Actions:

- UV filters and blinds where relevant
- Staff provided with shade and sun protection
- Monitoring systems track environmental changes



3. Drought

Risks:

Unknown impacts on the thermal spring; increased fire risk to wooden structures

Actions:

- Research and collaboration with external experts (e.g., UNESCO) underway
- Discussions underway to better understand and prepare for long-term effects



4. High Winds & Storms

Risks:

Structural damage from debris; safety risks on terraces

Actions:

- Regular roof inspections and surveys
- Terrace closures during severe weather
- Reactive maintenance protocols in place



5. Infrastructure Disruption

Risks:

Power outages and transport issues affecting operations

Actions:

- Emergency procedures for electricity failures
- Review of extreme weather policies planned



How We're Responding

Short-Term:

Maintenance, monitoring, and emergency procedures are in place and regularly reviewed

Long-Term:

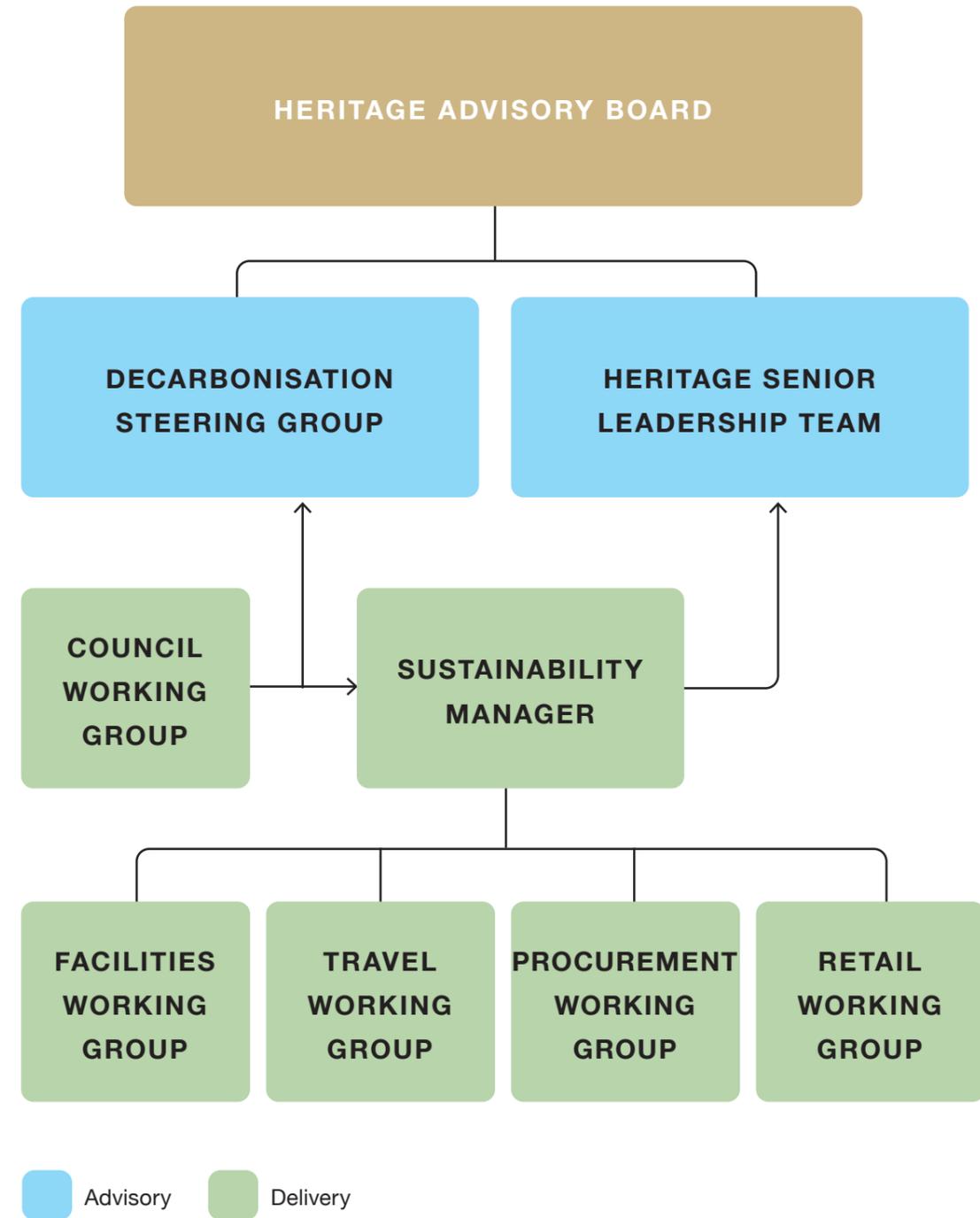
Investment in infrastructure, conservation, and climate resilience is being planned based on ongoing assessments and expert advice

Sustainability Governance

Our targets and actions are regularly reviewed by the Heritage Service Senior Leadership Team. Progress against targets is also included in the annual business plan which is reviewed yearly as part of the Council's budget setting process.

Targets are also reported on and overseen by the independent Heritage Services Advisory Board.

Although the Heritage Services has set their own sustainability commitments, the Service is aligned with the Council's overall approach to tackling the climate & nature emergencies. The head of Sustainable Economy, also under the Sustainable Communities Directorate, is included in the Decarbonisation Steering Group, and we work closely with the Council's Climate and Environment Team.



Examples in Practice

Decarbonisation in Action

Public bathhouses were a hallmark of Roman towns and cities, serving not only as places for bathing but also as vibrant social hubs. These complexes featured rooms with varying temperatures: the caldarium (hot), the tepidarium (warm), and the frigidarium (cold). Managing heat effectively was essential to the bathing experience.

The Roman Baths in Bath, known to the Romans as Aquae Sulis, were unique because they were built around Britain's only natural hot springs. The Sacred Spring, at the heart of the bathing complex, dedicated to the goddess Sulis Minerva, provided a constant supply of hot water. Reaching temperatures of up to 46°C (114.8°F), the spring-fed water kept the baths warm even during the coldest winters.

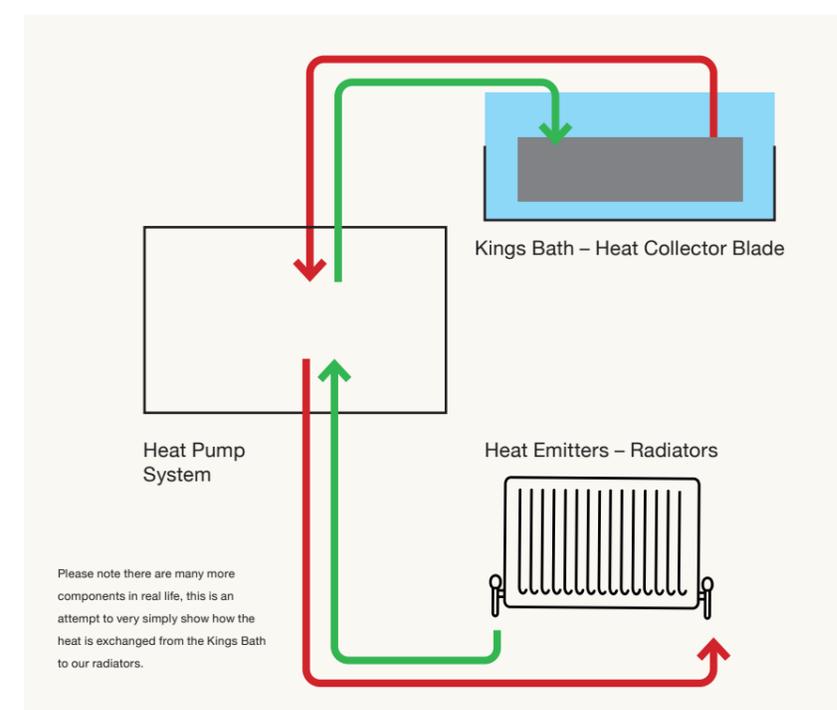
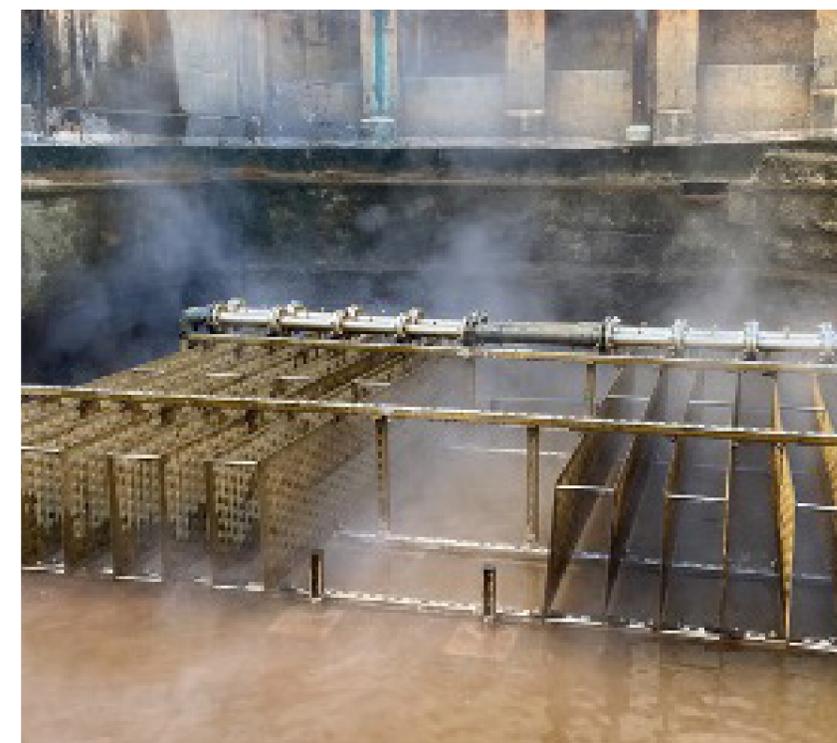
Beyond offering warmth, the baths were central to Roman social and cultural life. People from all walks of life gathered to bathe, relax, and socialise. The Romans recognised the power of the hot springs and made them the centrepiece of one of the most impressive architectural complexes in Roman Britain.

Today, the same naturally heated waters continue to flow through the historic site and the energy is captured and used in our heating system. In 2022, we installed a heat pump system which includes a series of pumps, compressors, expanders and exchangers to extract heat from one place and re-use it elsewhere. In our case, we are extracting heat from the Kings Bath and using it to heat the World Heritage Centre and The Roman Baths.

A heat pump system is very complex, we are 'pumping' heat as a flow – from one fluid to another. We start with a source of heat, in this case the Kings Bath. Underwater blades in the Kings Bath collect heat from the naturally warm spring water that is circulating at 46°C, it then gets transferred to a Heat Pump. The Heat Pump uses compression and expansion of a gas to create a 'hot' zone and a 'cold' zone – The Cold zone extracts heat from the Blade water and then the energy is passed to the Hot zone to heat the water that then circulates around radiators, heating the buildings.

Heat Pumps are efficient – they generally output a lot more heat than they consume in electricity. In the Heat Pumps we have here, 1 unit of electricity makes 3 units of heat.

In 2024, the heat pumps produced **99% of the heat demands of the World Heritage Centre**, and around **20% of the demand at The Roman Baths**. This has **saved around 38 tonnes of CO₂e** compared to using the equivalent in gas, which is equal to 4 return flights from London to Sydney¹¹.



¹¹ According to the latest emission factors from DEFRA for Natural Gas (2024). LDN – SYD Return = 34,032 kms. Average passenger long-haul flight = 0.26128 kgCO₂e = 8.9 tCO₂e 38 / 8.9 = 4.2 return flights. DEFRA 2024 Emission Factors.

Examples in Practice

Supplier Spotlight – St Ewe Eggs

St Ewes Eggs have a commitment to source only RSPCA Free range assured eggs and commenced a partnership with St Ewe's in Cornwall.

St Ewe works exclusively with RSPCA-assured farms as a minimum standard. This means eggs laid by hens that have guaranteed:

1. Environmental enrichment both inside and outside.
2. Shade and shelter, including trees and bushes which protect the birds from bad weather and predators. This helps the birds feel safer and range more freely, as well as provides natural foraging opportunities.
3. Access to dust pits giving them the opportunity to dustbathe and keep their feathers healthy and clean, an essential requirement for hens.

Across 2024, The Pump Room purchased 10,000 RSPCA Assured eggs, this relates to 91% compliance to our ambition. In Q1 2025, we are currently tracking at 97%.

St Ewe's have recently announced their B-Corp certification, supporting their sustainability initiatives taken to date which include:

- Installing solar panels on the roof of their packing facility, as well as sourcing all grid electricity from renewables sources. Around 50% of their packing centre electricity is from their solar array
- Working to ensure all soy in their feed is from responsible sources by 2026 in line with the UK Soy Manifesto
- Building a 3-year restorative plan to reach net positive biodiversity including soil health, water resilience, carbon emissions and animal and farmer welfare. Their target is to have all farms audited with a plan in place by 2027
- All packaging is between 70-100% recycled content, and is 100% recyclable, produced using solar and wind energy
- Launched electric vehicle deliveries to local customers in Cornwall, looking to expand further

St Ewe is currently working on farm agroforestry projects enabling some of their hens to be raised amongst woodlands and orchards, which is beneficial for soil, water, hens and biodiversity. They already have several farms working in this way including one farm in Devon where the flock is raised amongst an established woodland. This was created over 20 years ago to promote good soil, create resilience for the farm against climate change and extreme weather and to enable a biodiverse habitat for the hens to range in, for the wider benefit of the landscape. The result is happy hens who feel safe to range in the tree covers and enjoy the natural larder, enrichment, and hedgerows.



Examples in Practice

Supplier Spotlight – Wildfarmed Flour

Wildfarmed are on a mission to change soil health and biodiversity through a commitment to growing flour with farmers who follow their ‘Soil Standards’.

These were developed in response to a lack of industry definition regarding ‘regenerative’. Wildfarmed standards stipulate that all of their growers must engage in the following:

- Include species rich cover crops or diverse pasture mixes to keep their soil covered at all times
- Cereals to be grown alongside companion crops – this could be bi or poly-cropping
- Integrating animals wherever possible
- No pesticides on growing crop
- Nutrition to be applied based on plant need through sap testing

In July 2024, Searcys moved to incorporating Wildfarmed flour in their scones, signature Sourdough and through ranges such as La Tua pasta. Since July, they have sold 67,556 scones, equating to the use of 1,330kg of Wildfarmed flour in lieu of standard flour. Using Wildfarmed flour results in 2.5kg less CO₂e emissions compared to standard flour, resulting in 3,326.89kg CO₂e saved in making the swap¹². This is the equivalent to 7.5 return flights between Bristol and Barcelona¹³.

‘3.6 million tonnes of carbon could be saved by 2030 if every operator across the UK hospitality and brewing sector switched to regenerative flour and barley, according to new data from not-for-profit Zero Carbon Forum and the UK’s leading regenerative farming and food business, Wildfarmed. That’s the same as cancelling more than 5.5 million one-way flights between London and New York.’

www.zerocarbonforum.com

¹² According to a cradle to grave lifecycle assessment undertaken by Wildfarmed, in comparison to standard flour (-1.5kg CO₂e/kg vs +1kg CO₂e/kg, including removals and avoidance). Further information available on request with Searcys & Wildfarmed directly.

¹³ BRS – BCN Return = 2,360 kms. Average passenger short-haul flight = 0.18592 kgCO₂e = 438 kgCO₂e (DEFRA 2024 Emission Factors) 3,326.89 / 438 = 7.5 return flights



Annex I

Sustainability Actions

Table of sustainability actions

Heritage Goal	Service Action	Indicator (s)	Which Council priority is the action aligned with?	Sustainable Development Goal and aligned target
Decarbonise operations	All office lighting to be LED	Reduction in electricity kWh consumed	Decarbonise buildings & Net Zero operations	Goal 9, Target 4
	Optimise usage of existing Building Management System	Reduction in electricity kWh consumed		Goal 9, Target 4
	Reduce electricity consumption with replacement and upgrades of older and high consuming units	Reduction in electricity kWh consumed		Goal 7, Target 2
	Explore opportunities for on-site renewable electricity generation	Reduction in general waste kg produced		Goal 7, Target 2
	Work with waste contractors to ensure no waste to landfill	Increase in mixed recycling / general waste ratio kg produced	Net Zero operations	Goal 12, Target 5
	Improve the employee & visitor led recycling bin set up	Increase in mixed recycling / general waste ratio kg produced		Goal 12, Target 5
Improve our sustainability data accuracy	Improve electricity metering set up across all sites	Resources available, supplier engagement and improved Scope 3 data accuracy	Decarbonise Council own operations	Goal 13, Target 2
	Support suppliers with relevant sustainability resources and guidance	Improved Scope 3 data, additional categories		Goal 13, Target 2
	Map and begin quantifying digital emission sources	Improved Scope 3 data, additional categories		Goal 13, Target 2
	Collaborate with other attractions nationwide to arrive at a standardised methodology for apportioning visitor travel emissions	Improved Scope 3 data, additional categories	Decarbonise transport	Goal 12, Target 12.b
	Collate better data on visitor origin from booking system data	Improved Scope 3 data, additional categories		Goal 12, Target 12.b

Annex I

Sustainability Actions

Table of sustainability actions

Heritage Goal	Service Action	Indicator (s)	Which Council priority is the action aligned with?	Sustainable Development Goal and aligned target
Empower and engage our visitors, employees and suppliers	Set up regular supplier engagement workshops to support with data collection	Number of suppliers engaged with, improved scope 3 data	Decarbonise Council own operations	Goal 12, Target 6
	Create strategic partnerships that reward low-carbon visitor travel	Number of partnerships created, lower visitor travel emissions	Decarbonise transport	Goal 13, Target 2
	Undertake an audit of all retail product materials and packaging and assign internal Red / Amber / Green sustainability rating	Number of products rated against the internal criteria	Decarbonise Council own operations	Goal 12, Target 6
	Deliver Carbon Literacy training to all employees	Number of employees certified carbon literate	Decarbonise Council own operations	Goal 13, Target 2
	Work with catering partners to ensure visitors at the Pump Room restaurant have access to sourcing information and impacts	Dish provenance, visitor engagement, and external communications	Decarbonise Council own operations	Goal 8, Target 9
	Establish a programme of communication and activity that positively influences visitors behaviour. E.g. engage visitors on climate issues through our learning and participation programme	Visitor engagement with sustainability communications & initiatives	Decarbonise Council own operations	Goal 8, Target 9
	Develop a sustainability policy and action plan for our venue hire	Improved Scope 3 data, additional categories	Decarbonise Council own operations	Goal 13, Target 2
	Communicate the story of human impact on the environment through our collections and thermal Spring	Visitor engagement with sustainability communications & initiatives	Decarbonise Council own operations	Goal 13, Target 2
	Begin work on implementing the Doughnut Economic model to business operations	Improved Scope 3 data, better understanding of Bath's visitor economy through improved data accuracy	Decarbonise Council own operations	Goal 8, Target 9

Annex I

Sustainability Actions

Table of sustainability actions

Heritage Goal	Service Action	Indicator (s)	Which Council priority is the action aligned with?	Sustainable Development Goal and aligned target
Lead by example	Improve our sustainability data, monitoring and reporting related to climate-related risks and adaptation	Number of climate-related risks identified and adapted to	Decarbonise Council own operations	Goal 11, Target 4
	Use our agency as a leading visitor attraction to share data and best practices to aid industry benchmarking	Shared case-studies, external events attendance and hosting		Goal 11, Target 4
	Establish meaningful partnerships with other organisations	Number of partnerships created, improved data		Goal 11, Target 4
	Finalise work on drainage and flooding issues on the Roman Baths roof	Project completion	Decarbonise buildings	Goal 11, Target 4
	Undertake work to understand how to stop the great drain from flooding under heavy rainfalls	Monitoring and evaluation of environmental impacts on the great drain and thermal spring	Decarbonise Council own operations	Goal 11, Target 4
	Finalise and publish our Climate Change Risk Assessment and Adaptation Plan	External facing climate adaptation plan, internal climate risk assessment embedded within current risk management framework		Goal 11, Target 4
	Continue to deliver Fashion Museum Bath as an exemplar of environmental sustainability	Project completion	Decarbonise buildings	Goal 13, Target 2

Annex II

Emissions Data & Methodology

Table showing emission calculation data sources, accuracy and plans to improve over time:

Accurate activity data		Spend / other proxy data	Estimated activity data
Emission Source	Data Used	Method & Emission Multipliers	Improvements from 25/26
Gas	Meter & billing data	GHG Protocol, DEFRA Emission Factors	N/A
Fugitive Emissions	Contractor service & maintenance records	GHG Protocol, DEFRA Emission Factors	N/A
Electricity	Meter & billing data	GHG Protocol, DEFRA Emission Factors	N/A
Object Travel	Internal object loan records	Vehicle types estimated, DEFRA Emission Factors	Capture better information on vehicle types
F&B	Searcys spend data	Searcys own carbon calculation. Specialised SaaS platform which uses Exiobase. Ecolnvent and CEDA Emission Factors	Searcys own supplier specific emissions & data improvement. Searcys aim to get a more precise carbon calculation according to item volume.
Water	Meter & billing data	GHG Protocol, DEFRA Emission Factors	N/A
Waste	Estimated from capacity & pick up frequency (SEPA Density Conversion factors)	GHG Protocol, DEFRA Emission Factors	Accurate weight data from new suppliers in place
Retail	Internal spend data	GHG Protocol, UK Government S.I.C. Codes with inflation applied	Work on-going to gather supplier emissions intensity
Purchased Goods & Services	Internal spend data	GHG Protocol, UK Government S.I.C. Codes with inflation applied	Work on-going to gather supplier emissions intensity
Business Travel	Internal booking system, spend data, and expense claims	GHG Protocol, DEFRA Emission Factors	N/A
Upstream Leased Assets	Spend data (Dents leased storage facility) and mileage (retail van)	GHG Protocol, DEFRA Emission Factors, SIC Codes	N/A
Employee Commuting	Internal survey 43% response rate	GHG Protocol, DEFRA Emission Factors	Work on-going to improve response rate
Homeworking	Internal survey 43% response rate	GHG Protocol, DEFRA Emission Factors	Work on-going to improve response rate
WTT T&D	All relative to individual fuel and electricity related categories	GHG Protocol, DEFRA Emission Factors	N/A
Visitor Travel	Audioguide language data, post-visit survey & national averages from Visit Britain	Apportioning calculation applied based on average reasons for visiting Bath & dwell time. Modes of transport estimated based on distance to Bath.	Plans to collate better visitor origin data from new visitor management system. Plans to streamline apportioning methodology in the sector / region.